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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GOOD COMPANIES, KLAUSSNER FURNITURE  
INDUSTRIES, INC., CONTINENTAL INSURANCE  
COMPANY, HERBA ENTERPRISE INC., KWOK SHING  
HONG LLC, THE MAYA GROUP INC., GLOBAL  
SOLUTIONS INSURANCES, INC., GUILDCRAFT OF  
CALIFORNIA TABLE WAREHOUSE, HOLLY  
DECORATIONS, CONTINENTAL CASUALTY  
CO., PRINCE OF PEACE ENTERPRISES, INC., DESTINY  
SALES AND MARKETING, CNA MARITIME,  
QUINGDAO YIJIA E.T.I. I/E CO., LTD., THE TOKIO FIRE  
AND MARINE INSURANCE CO., LTD., JAZZY  
ELECTRONICS INC. d/b/a SOUND AROUND, INC.,  
INTERNATIONAL MARINE UNDERWRITERS, TOSHIBA  
AMERICA CONSUMER PRODUCTS, INC., NIPPONKOA  
INSURANCE CO., LTD., CELS ENTERPRISES, INC.,  
FIREMAN'S FUND INSURANCE CO., SAFEWAY INC.,  
PRECEPT MEDICAL PRODUCTS, INC., ARMBEE  
CORPORATION, SEATECH CORPORATION, JEMCO  
INTERNATIONAL, INC., THE FELDMAN CO., DUBOSE  
TRADING COMPANY, THE HERCULES TIRE & RUBBER  
CO., CSK AUTO CORP., SAM ASH MUSIC CORP.,  
L.POWELL CO., WONDERTREATS, INC., GALLERIA  
INC. AND PAL, C.W.E. CO., LAVA ENTERPRISES, INC.,  
CALIFORNIA SUNSHINE ACTIVEWEAR, INC.,  
CHAINTECH AMERICA CORPORATION, STANDARD  
SALES, INC., P.J. KIDS LLC, ELEMENTS BY  
GRAPEVINE, INC., HEDSTROM CORP., GEA  
PRODUCTS, GE SUPPLY LOGISTICS, INTERNATIONAL  
DEVELOPMENT CORP., J. HOFFET CO., ITOCHU  
BUILDING PRODUCTS CO., INC., HECNY  
TRANSPORTATION (USA) INC., ACE USA, ACE  
EUROPE, LEADING STAR TRADING CO., RED RIVER  
FOODS, XL INSURANCE GLOBAL RISK, ABC Corp.  
(name being fictitious), and JOHN DOE (name being  
fictitious),

04 civ. 6705(KAPLAN)

ECF CASE

COMPLAINT

Plaintiffs,

-against-

the M/V "TRADE ZALE" and the M/V "DIAMOND RAY", their engines, boilers, ground tackle, and appurtenances, *in rem*, and MS JAN RITSCHER SCHIFFFAHRTSGES MBH & CO. KG., HONSHU SHIPPING CO. LTD., HANJIN SHIPPING, METRO CONSOLIDATORS HONG KONG, AERO COSTA INTERNATIONAL, RAF INTERNATIONAL FORWARDING INC., CARPE AIR & SEA SHIPPING INC., AIR-SEA TRANSPORT INC., CN LINK FREIGHT SERVICES INC., DYNALINK SYSTEMS INC., SINO-AM MARINE COMPANY INC., KASY LOGISTICS CO., LTD., INTERMODAL SYSTEMS LTD., WICE MARINE SERVICES LTD., CL CONSOLIDATORS SERVICES LTD., YOUNGER SERVICE CO., LTD., A T CONTAINER LINES LTD., SINOTRANS CONTAINER LINES, CITY NETWORK SHIPPING LTD., SOLEX EXPRESS INC., OEC FREIGHT (KOREA) CO. LTD., TVL CONTAINER LINE LTD., HONOUR LANE SHIPPING, and POWER LINK LOGISTICS INC., *in personam*,

Defendants.

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The Plaintiffs herein, by their attorneys, Hill Rivkins & Hayden LLP, complaining of the above named vessels and defendants allege upon information and belief as follows:

**FIRST:** This Court has jurisdiction pursuant to 28 U.S.C. 1333 in that this is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure.

**SECOND:** At and during all the times hereinafter mentioned, Plaintiffs had and now have the legal status and principal offices and places of business stated in Schedule A hereto annexed and by this reference made a part hereof.

**THIRD:** At and during all times hereinafter mentioned, defendants had and now have the legal status and offices and places of business stated in Schedule A, and now are engaged in business as common carriers of merchandise by water for hire, and owned, operated, managed, chartered, and controlled the above named vessels which now are or will be within the jurisdiction of this Court during the pendency of this action, and additionally conducted business within the boundaries of the Southern District of New York State.

**FOURTH:** On or about the date and at the ports of shipment stated in Schedule A, there was delivered to the vessels and defendants in good order and condition the shipments described in Schedule A, which the said vessels and defendants received, accepted and agreed to transport for certain consideration to the port of destination stated in Schedule A.

**FIFTH:** Thereafter, the cargoes described in Schedule A were delivered short, otherwise damaged, and/or were never delivered.

**SIXTH:** By reason of the premises, the above named vessels and defendants breached, failed and violated their duties and obligations as common carriers and were otherwise at fault.

**SEVENTH:** By reason of the premises, the above named defendants breached, failed, and violated their contractual duties and obligations to Plaintiffs.

**EIGHTH:** Plaintiffs were the shippers, consignees, insurers or owners of the shipments as described in Schedule A, and bring this action on their own behalf and, as agents and trustees, on behalf of and for the interests of all parties who may be or become interested in the said shipment, as their respective interests may ultimately appear, and Plaintiffs are entitled to maintain this action.

**NINTH:** Plaintiffs have performed all duties and obligations on their part to be performed.

**TENTH:** By reason of the premises, Plaintiffs have sustained damages as nearly as same can now be estimated, no part of which has been paid, although duly demanded, in the amount of \$6,000,000.00.

**W H E R E F O R E,** Plaintiffs pray:

1. That process in due form of law according to the practice of this Court may issue against the defendants.

2. That if the defendants cannot be found within this District, that all of their property within this District be attached in the sum set forth in this complaint, with interest and costs.

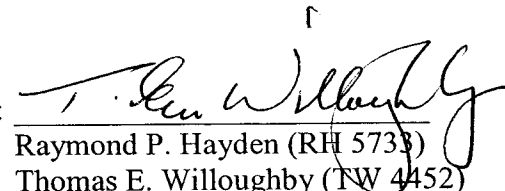
3. That a decree be entered in favor of Plaintiffs against defendants and the vessels for the amount of Plaintiffs' damages, together with interest and costs.

4. That process in due form of law according to the practice of this Court may issue against the aforesaid named vessels.

5. Plaintiffs further pray for such other, further and different relief as to this Court may seem just and proper in the premises.

Dated: New York, New York  
August 18, 2004

HILL RIVKINS & HAYDEN  
Attorneys for Plaintiffs,

By:   
Raymond P. Hayden (RH 5733)  
Thomas E. Willoughby (TW 4452)  
45 Broadway, Suite 1500  
New York, New York 10006  
(212) 669-0600

SCHEDULE A

LIST OF INTERESTED PLAINTIFFS

28602- A - HJ9C9HAA30499400  
Shanghai/ Wilmington, NC  
68 ctns furniture  
Shipper: Shanghai Trayton Furniture Co., Ltd.  
Consignee: Klaussner International LLC,  
405 Lewallen Rd.,  
Drawer 220  
Asheboro, North Carolina 27204  
Insurance Co: Continental Insurance Company  
One Galleria Blvd., Suite 1513,  
Metairie, LA 70001  
\$18,859.13 CIF

28602- B - SNTUSNLS45000515  
Guangzhou/ San Francisco, CA  
793 CTNS. Chinese herbs  
Shipper: Guangzhou Begol Trading Corporation  
Consignee: Herba Enterprise Inc.  
1150 Thomas Avenue  
San Francisco, CA 94124  
Insurance Co.: Continental Insurance Company  
One Galleria Blvd., Suite 1513  
Metairie, LA 70001  
\$46,549.45 FOB  
\$2,850.00 freight charge  
494.00 + 1%  
\$49,893.75 CIF

SNLWZS300022  
858 ctns. Chinese herbal beverages  
Shipper: Guangzhou Begol Trading Corporation  
Consignee: Herba Enterprise Inc.  
1150 Thomas Avenue  
San Francisco, CA 94124  
Insurance Co.: Continental Insurance Company  
One Galleria Blvd., Suite 1513  
Metairie, LA 70001  
\$23,030.00 FOB  
\$230.00 + 1%  
\$2,815.00 freight charge

\$26,075.00 CIF

SNTUSNLS47010200

Hong Kong/ Oakland, CA

486 Cartons Chinese herbs

Shipper: South Project Ltd.

Consignee: Kwok Shing Hong, Inc.

1818 Harrison Street

San Francisco, CA 94103

Insurance Co.: Continental Insurance Company

One Galleria Blvd., Suite 1513

Metairie, LA 70001

\$40,969.51 FOB

\$409.70 + 1%

\$1,980.00 freight charge

\$43,359.21 CIF

28602- C - SZLA 0401001

Hong Kong/ Garden Grove, CA

5179 cartons stuffed toys

Shipper: Toys Plus

Consignee: The Maya Group

12622 Monarch

Garden Grove, CA 92841

Insurance Co.: Global Solutions Insurances, Inc

2512 Artesia Boulevard, Suite 250,

Redondo Beach, CA 90278

\$426,779.68 FOB

\$4,267.80 + 1%

\$431,047.48 Freight TBD

28602- D - SNTUSNLL 47010388

Taiwan/Rancho Dominguez, CA

320 ctns. wood furniture

Shipper: TOC Furniture Inc.

Consignee: Guildcraft of California Table Warehouse

3130 Maria Street, Rancho Dominguez, CA 90221

Insurance Co.: Continental Insurance Co.

One Galleria Blvd., Suite 1513

Metairie, LA 70001

\$37,150.00 FOB

\$371.50 +1%

\$2,304.15 freight charge + customs fees

\$39,825.65 CIF

SNTUSNLL 4701389

313 ctns. wood furniture

Shipper: TOC Furniture Inc.

Consignee: Guildcraft of California Table Warehouse  
3130 Maria Street, Rancho Dominguez, CA 90221

Insurance Co.: Continental Insurance Co.

One Galleria Blvd., Suite 1513

Metairie, LA 70001

\$36,320.00 FOB

\$363.20 + 1%

\$2,301.37 freight charge + custom fees

\$38,984.57 CIF

SNTUSNLL 47010294

142 ctns. wood furniture

Shipper: TOC Furniture Inc.

Consignee: Guildcraft of California Table Warehouse  
3130 Maria Street, Rancho Dominguez, CA 90221

Insurance Co.: Continental Insurance Co.

One Galleria Blvd., Suite 1513

Metairie, LA 70001

\$21,897.00 FOB

\$218.97 + 1%

\$2,378.96 freight charge + custom fees

\$24,494.83 CIF

SNTUSNLL 47010387

317 ctns. wood furniture

Shipper: TOC Furniture Inc.

Consignee: Guildcraft of California Table Warehouse  
3130 Maria Street, Rancho Dominguez, CA 90221

Insurance Co.: Continental Insurance Co.

One Galleria Blvd., Suite 1513

Metairie, LA 70001

\$37,200.00 FOB

\$372.00 + 1%

\$2,335.83 freight charge + custom fees

\$39,907.83 CIF

28602-E -

SNTUSNLS 450005151

Chiwan/ Sparks, NY

2,375 pkgs rell rope light

Shipper: Yengay International Co., Ltd.

Consignee: J. Hoffet Co.  
1755 East Prater Way  
Sparks, NV 89434

Assured: Holly Decorations



Insurance Co.: Continental Casualty Co.  
 \$38,650.00 FOB  
\$386.50 + 1%  
\$39,036.50 freight TBD

28602-F - 15668HKOK401 V0017E  
 China/ USA  
 92 drums cultivated American ginseng ungraded;  
 17 drums cultivated American ginseng; and,  
 5 ctns card

Shipper: Prince of Peace Enterprises, Inc.  
 Consignee: Prince of Peace Enterprises, Inc.  
 3536 Arden Road  
 Haywood, CA 94545

Insurance Co.: Continental Casualty Co.  
 One Galleria Blvd., Suite 1513  
 Metairie, LA 70001  
\$105,835.00 total ins. value

28602-G - SNTUSNLL45001886  
 Huangpu/ Long Beach, CA  
 118 pkgs. Musical instruments  
 Shipper: Jisheng Musical Instrument Manufacturing Ltd./  
 Consignee: Destiny Sales and Marketing  
 308 16<sup>th</sup> St. #4  
 Huntington Beach, CA 92648

Insurance Co.: CNA Maritime  
 800 Howard Street, Suite 600  
 San Francisco, CA 94105  
\$32,448.00 total ins. value

28602-1 - KYTJ04011831  
 Tianjin/Long Beach, CA  
 1,337 pkgs. of wire netting  
 Shipper: Qingdao Yijia B..I. I/E Co., Ltd.  
 Consignee: Itochu Building Products Co., Inc.  
 660 White Plains Road  
 Tarrytown, NY 10591  
 Insurance Co.: The Tokio Fire and Marine Insurance Co., Ltd.  
 2-1, Marunouchi 1-chome,  
 Chiyoda-ku, Tokyo 100-8050, Japan  
 \$16,514.00 FOB  
 \$165.14 + 1%  
\$2,100.00 freight charge  
\$18,779.14 CIF

28602-2 - CFAS 2004013747  
 Zhejiang/NY  
 1560 ctns speaker cabinets and speakers  
 Shipper: Zhejian Shiner Import and Export Co., Ltd.  
 Consignee: Sound Around, Inc.  
 1800 63<sup>rd</sup> Street,  
 Brooklyn, NY 11204  
 Insurance Co.: International Marine Underwriters  
 77 Water Street, 16<sup>th</sup> Floor  
 New York, NY 10005  
 \$43,805.20 FOB  
 \$438.05 + 1%  
\$2,750.00 freight charge  
\$46,993.25 CIF

28602-3 - SHA4SE66855  
 Shanghai/Wayne, NJ  
 9,940 cartons DVD players (FOB)  
 Shipper: Shanjin LG Electronics, Co., Ltd.  
 Consignee: Toshiba America Consumer Products, Inc.  
 82 Totowa Road  
 Wayne, NJ 07470  
 Insurance Co.: Nipponkoa Insurance Company, Ltd.  
 601 South Figueroa Street, Ste. 2100  
 Los Angeles, CA 90017  
 \$570,357.20 FOB  
 \$5,703.57 + 1%  
\$576,060.77 freight TBD

28602-4 -A SNTUSNLL4051017B  
 Hong Kong/Los Angeles, CA  
 Shipper: Reclas Limited  
 Consignee: Cels Enterprises Inc.  
 3485 S. La Cienega Blvd.  
 Los Angeles, CA 90016  
 Insurance Co.: Fireman's Fund Insurance Co.  
 600 Wilshire Blvd., Suite 1600  
 Los Angeles, CA 90017  
 375 ctns ladies footwear  
 \$61,200.00 FOB  
 \$612.00 + 1%  
\$1,950.00 freight charge  
\$63,762.00 CIF

28602-4 -B CHW/OAK/04113  
 Hong Kong/ San Francisco, CA  
 Shipper: Atico International  
 Consignee: Safeway Inc.  
 5918 Stoneridge Mall Rd.  
 Pleasanton, CA 94588  
 Insurance Co.: Fireman's Fund Insurance Co.  
 600 Wilshire Blvd., Suite 1600  
 Los Angeles, CA 90017  
 6415 cartons children's park benches  
 \$51,320.00 FOB  
 \$513.20 + 1%  
\$9,800.00 freight charged  
\$61,633.20 CIF

28602-4 -C SNLL45001666/ SYTNGL010108  
 Hong Kong/ North Carolina  
 Shipper: Precept Medical Products, Inc.  
 Consignee: Precept Medical Products, Inc.  
 White Knight Health Care, Inc.  
 P.O. Box 2400  
 Arden, NC 28704  
 Insurance Co.: Fireman's Fund Insurance Co.  
 13777 Bellantyne Corp. Park, Suite 505  
 Charlotte, NC 28277  
 667 CTNS disposable medical products  
 \$14,524.00 FOB  
 \$145.24 + 1%  
\$14,699.24 Freight TBD

SNLL45001666/ SYTNGL010107  
 Hong Kong/ Los Angeles  
 Shipper: Precept Medical Products, Inc.  
 Consignee: Precept Medical Products, Inc.  
 White Knight Health Care, Inc.  
 P.O. Box 2400  
 Arden, NC 28704  
 Insurance Co.: Fireman's Fund Insurance Co.  
 13777 Bellantyne Corp. Park, Suite 505  
 Charlotte, NC 28277  
 1804 CTNS disposable medical products  
 \$20,911.00 FOB  
 \$209.11 + 1%  
\$21,120.11 Freight TBD

28602-4 -D SNTUSNLS42007085 (Master Bill No.)

Hong Kong/ San Francisco, CA  
Shipper: Holly Trading Co.  
Consignee: Armbee Corp.  
390 Selby Street  
San Francisco, CA 94124  
Insurance Co.: Fireman's Fund Insurance Co.  
San Francisco Field Office  
One Market, Spear Twr., 11<sup>th</sup> Floor  
San Francisco, CA 94105  
78 Bales general merchandise  
\$2,584.00 FOB  
\$25.84 + 1%  
\$1,700.00 freight charges  
\$4,309.84 CIF

28602-4 -E STUSNLL43010039  
China/ Washington, USA  
Shipper: Dalian Shangli Food Ltd.  
Consignee: Seatech Corporation  
14500 141<sup>st</sup> Ave. SE  
Snohomish, WA 98290  
Insurance Co.: Fireman's Fund Insurance Company  
2101 Fourth Avenue, Suite 1100  
Seattle, WA 98121  
5032 ctns shrimp kernel can  
\$18,668.72 FOB  
\$186.67 + 1%  
\$18,855.39 Freight TBD

28602-4 -F SW004056  
Shangai, China/ Santa Ana California  
Shipper: Shangai Toys  
Consignee: JEMCO International Inc.  
1820 East Garry Ave.  
Suite 219  
Santa Ana, CA 92705  
Insurance Co.: Fireman's Fund Insurance Co.  
75 Wall Street - 19<sup>th</sup> Floor  
New York, NY 10005  
435 cartons cotton/ canvas tote bags & baseball caps  
\$49,544.76 FOB  
\$495.45 + 1%  
\$50,040.21 Freight TBD

28602-4 -G EDS040116  
Beijing, China/ New York, NY

Shipper: Chinalight Suitcases Bags & Safety  
 Consignee: The Feldman Co.  
 149 West 36<sup>th</sup> Street, 3 Fl.  
 New York, NY 10018  
 Insurance Co.: Fireman's Fund Insurance Co.  
 75 Wall Street – 19<sup>th</sup> Floor  
 New York, NY 10005

224 rolls flannel print  
 \$39,414.18 FOB  
\$394.14 + 1%  
\$39,808.32 Freight TBD

28602-4 –H Insured: Dubose Trading Co.  
 906 Industrial Drive  
 Clinton, NC 28328  
 Insurance Co.: Fireman's Fund Insurance Co.  
 75 Wall Street – 19<sup>th</sup> Floor  
 New York, NY 10005  
\$2,500 insurance reserve cost

28602-4 –I GZLGB010087  
 China/ Findlay, OH  
 Shipper: South China Tire and Rubber Co.  
 Carrier: The Hercules Tire & Rubber Co.  
 1300 Morrical Boulevard  
 Findlay, OH 45840  
 Insurance Co.: Fireman's Fund Insurance Co.  
 33 West Monroe Street  
 Chicago, IL 60603  
 283 pcs tires  
 \$30,510.02 CNF  
\$305.10 + 1%  
\$30,815.12 CIF

GZOAK010088  
 China/ Findlay, OH  
 Shipper: South China Tire and Rubber Co.  
 Carrier: The Hercules Tire & Rubber Co.  
 1300 Morrical Boulevard  
 Findlay, OH 45840  
 Insurance Co.: Fireman's Fund Insurance Co.  
 33 West Monroe Street  
 Chicago, IL 60603

258 pcs tires  
 \$30,534.58 CNF

\$305.35 + 1%  
\$30,839.93 CIF

28602-4 -J SNLL32600007  
Tianjin, China/ Jamaica, NY  
Shipper: Hecny Transportation Ltd.  
Consignee: Hecny Transportation (USA) Inc.  
147-39 175<sup>th</sup> Street, Suite 102  
Jamaica, NY 11434  
Insured: Sam Ash Music Corporation  
278 Duffy Ave.  
Hicksville, NY 11801  
Insurance Co.: Fireman's Fund Insurance Co.  
75 Wall Street – 19<sup>th</sup> Floor  
New York, NY 10005  
1054 cartons musical instruments

SNLL42600005  
Shipper: Hecny Transportation Ltd.  
Carrier: Hecny Transportation (USA) Inc.  
Insured: Sam Ash Music Corporation  
278 Duffy Ave.  
Hicksville, NY 11801  
Insurance Co.: Fireman's Fund Insurance Co.  
75 Wall Street – 19<sup>th</sup> Floor  
New York, NY 10005  
848 cartons percussion equipment  
\$196,300.00 total insurance value

28602-4 -K 6394076307  
China/ Phoenix, AZ  
Shipper: Jinkua Cargo  
Consignee: CSK Auto Corp.  
645 E. Missouri Ave., #400  
Phoenix, AZ 85012  
Insurance Co.: Fireman's Fund Insurance Company  
600 Wilshire Blvd., Suite 1600  
Los Angeles, CA 90017  
1480 ctns stools & seats  
\$54,143.52 CIF

28602-4 -L LGB3109803  
Shenzhen City, China/ Culver City, CA  
Shipper: Zhi Sheng Guang Dong Ltd/  
Consignee: L. Powell Company  
8631 Hayden Place

Culver City, CA 90232  
Insurance Co.: Fireman's Fund Insurance Company  
600 Wilshire Blvd., Suite 1600  
Los Angeles, CA 90017

482 ctns tv/vcr table  
\$24,271.38 FOB  
\$242.71 + 1%  
\$1,975.00 freight charges  
\$26,489.09 CIF

28602-4 -M DYSZ0400034  
China/ Modesto, CA  
Shipper: Guangdong Xinyi Hechang Bamboo  
Consignee: Wondertreats, Inc.  
2200 Lapham Drive  
Modesto, CA 95354  
Insurance Co.: Fireman's Fund Insurance Company  
One Market Plaza, 11<sup>th</sup> Floor  
Spear Street Tower  
San Francisco, CA 94105  
330 ctns bamboo baskets  
\$7,005.84 FOB  
\$70.06 + 1%  
\$7,075.90 Freight TBD

28602-4 -N SNLL42060146  
Quingdao, China/ Los Angeles, CA  
Shipper: Galleria Limited  
Consignee: Galleria Inc. and Pal  
4633 East La Palma Ave.  
Anaheim, CA 92807  
Insurance Co.: Fireman's Fund Insurance Company  
600 Wilshire Blvd., Suite 1600  
Los Angeles, CA 90017  
750 cartons of wood wall clocks  
\$16,335.00 FOB  
\$163.35 + 1%  
\$2,750.00 freight charges  
\$19,248.35 CIF

28602-4 -O HKLA4010215  
Hong Kong/ Gardena, CA  
Shipper: Wing Fat Die Casting Factory Ltd.  
Consignee: C.W.E. Co.  
1156 W 135<sup>th</sup> Street  
Gardena, CA 90247

Insurance Co.: Fireman's Fund Insurance Company  
600 Wilshire Blvd., Suite 1600  
Los Angeles, CA 90017

1044 ctns bathroom accessories

\$55,298.92 FOB

\$552.99 + 1%

\$3,787.19 freight

\$59,639.00 CIF

28602-4 -P RAFZ4010232

Guang Dong, China/ San Diego, CA

Shipper: Shunde Bright Lighting, Ltd.

Consignee: Lava Enterprises, Inc.

3979 Lockridge

San Diego, CA 92102

Insurance Co.: Fireman's Fund Insurance Company

600 Wilshire Blvd., Suite 1600

Los Angeles, CA 90017

1,315 cartons night lights

\$43,480.00 FOB

\$434.80 + 1%

\$5,862.37 freight charges

\$49,977.17 CIF

28602-4 -Q SHYZ032921A

Shanghai/ Los Angeles, CA

Shipper: Shanghai Threegun

Consignee: California Sunshine Activewear, Inc.

123 East 35<sup>th</sup> Street

Los Angeles, CA 90011

Insurance Co.: Fireman's Fund Insurance Company

600 Wilshire Blvd., Suite 1600

Los Angeles, CA 90017

120 ctns underwear

SHY032921

Shanghai/ Los Angeles, CA

Shipper: Shanghai Threegun

Consignee: California Sunshine Activewear, Inc.

123 East 35<sup>th</sup> Street

Los Angeles, CA 90011

Insurance Co.: Fireman's Fund Insurance Company

600 Wilshire Blvd., Suite 1600

Los Angeles, CA 90017

301 ctns underwear

\$154,635.55 total FOB



\$1,546.36 + 1%  
\$2,210.00 freight  
\$158,391.91 CIF

28602-4 –R   SNTUSNLS47010210  
 Taiwan/ Freemont, CA  
 Shipper:       Chaintech Computer Co.  
 Consignee:     Chaintech America Corporation  
                   4427 Enterprise Street  
                   Fremont, CA 94538  
 Insurance Co.: Fireman's Fund Insurance Company  
                   600 Wilshire Blvd., Suite 1600  
                   Los Angeles, CA 90017  
 312 ctns computer parts  
                   \$316,750.00 FOB  
                   \$3,167.50 + 1%  
                   \$2,906.82 freight charge  
                   \$322,824.32 CIF

28602-4 –S   SNTUSNLL43010082  
 China/ Los Angeles  
 Shipper:       Harbin Yuanheng Trade Co. Ltd.  
 Consignee:     Standard Sales Inc.  
                   2801 East 12<sup>th</sup> Street  
                   Los Angeles, CA 90023-3621  
 Insurance Co.: Fireman's Fund Insurance Company  
                   600 Wilshire Blvd., Suite 1600  
                   Los Angeles, CA 90017  
 389 ctns jungle boots  
                   \$19,323.36 FOB  
                   \$193.23 + 1%  
                   \$425.00 freight charge  
                   \$19,941.59 CIF

28602-5 –A   CFAS2004013747  
 Shanghai/ Los Angeles  
 Shipper:       Zhejiang Shiner Import  
 Consignee:     Sound Around Inc.  
                   1600 83<sup>rd</sup> Street  
                   Brooklyn, NY 11204  
 Insurance Co.: International Marine Underwriters  
                   77 Water Street, 16<sup>th</sup> Floor  
                   New York, NY 10005  
 Container SNBU8103745  
 780 ctns of speaker cabinets  
                   \$24,821.63 CIF

28602-5 -B CFAS2004013747  
Shanghai/ Los Angeles  
Shipper: Zhejiang Shiner Import  
Consignee: Sound Around Inc.  
1600 83<sup>rd</sup> Street  
Brooklyn, NY 11204  
Insurance Co.: International Marine Underwriters  
77 Water Street, 16<sup>th</sup> Floor  
New York, NY 10005

Container SNBU8105429  
780 ctns of speaker cabinets  
\$24,821.63 CIF

28602-5 -C CFAS2004013747  
Shanghai/ Los Angeles  
Shipper: Zhejiang Shiner Import  
Consignee: Sound Around Inc.  
1600 83<sup>rd</sup> Street  
Brooklyn, NY 11204  
Insurance Co.: International Marine Underwriters  
77 Water Street, 16<sup>th</sup> Floor  
New York, NY 10005

Container SNBU8011036  
780 ctns of speaker cabinets  
\$16,409.74 CIF

28602-5 -D CFAS2004013747  
Shanghai/ Los Angeles  
Shipper: Zhejiang Shiner Import  
Consignee: Sound Around Inc.  
1600 83<sup>rd</sup> Street  
Brooklyn, NY 11204  
Insurance Co.: International Marine Underwriters  
77 Water Street, 16<sup>th</sup> Floor  
New York, NY 10005\

Container SNBU8105373  
780 ctns of speaker cabinets  
\$16,409.74 CIF

28602-6 -A STNUSNLL47010222  
Hong Kong/ Long Beach, CA  
Shipper: Kingston Lux Corp  
Consignee: P.J. Kids LLC  
2041 Rosecrans Ace.

El Segundo, CA 90245  
Insurance Co.: ACE Europe  
4,739 ctns furniture  
\$80,309.40 CIF

28602-6 – B SNLS47010203  
Hong Kong/ Oakland  
Shipper: Agencia Commercial Sang Hang Mei  
Consignee: Elements by Grapevine Inc.  
18251 Highway 88  
Lockeford, CA 95237  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
212 ctns wooden furniture  
\$20,244.00 CIF

28602-6 –C SNL47010213  
Hong Kong/ Oakland  
Shipper: Jiant Furniture Co., Ltd.  
Consignee: Elements by Grapevine, Inc.  
18251 Highway 88  
Lockeford, CA 95237  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
  
158 ctns wooden furniture  
\$15,550.63 CIF

28602-6 –D SNLS47010216  
Hong Kong/ Oakland  
Shipper: King Group Furniture Co., Ltd.  
Consignee: Elements by Grapevine, Inc.  
18251 Highway 88  
Lockeford, CA 95237  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
193 ctns wooden furniture  
\$22,477.45 CIF

28602-6 –E SNLDA4018003  
Shanghai/ Long Beach, CA  
Shipper: Innovative Toys Co., Ltd.  
Consignee: Hedstrom Corp.

710 Orange Street  
Ashland, OH 44805  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
1,515 ctns of PVC balls  
\$24,950.16 CIF

28602-6 –F SNLL42808004  
Xingang/ Long Beach, CA  
Shipper: Sampo Corp.  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
1,326 sets of refrigerators  
\$286,466.00

28602-6 –G SNLL42805006  
Xingang/ Long Beach, CA  
Shipper: LG Electronics Tianjin  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
6,688 sets if microwave ovens  
\$177,587.20

28602-6 –H SNLL42805007  
Xingang/ Long Beach, CA  
Shipper: LG Electronics Tianjin  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
3,949 sets of microwave ovens  
\$177,587.20 CIF

28602-6 –I SNLBL4000062  
Busan/ Long Beach, CA

Shipper: LG Electronics Tianjin  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
3,000 ctns room air conditioners  
\$358,100.00 CIF

28602-6 -J SNLL41310046  
Shanghai/ Long Beach, CA  
Shipper: Suzhou Samsung Electronics Co., Ltd  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
3,120 sets compact refrigerators  
\$232,933.00 CIF

28602-6 -K SNLL42310047  
Shanghai/ Long Beach, CA  
Shipper: Suzhou Samsung Electronics Co., Ltd  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
240 sets compact refrigerators  
\$17,505.00 CIF

28602-6 -L SNLL41310048  
Shanghai/ Long Beach, CA  
Shipper: Suzhou Samsung Electronics Co., Ltd  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
5,754 sets of room air conditioners  
\$314,695.32 CIF

28602-6 –M SNLL41310052  
Shanghai/Long Beach, CA  
Shipper: Suzhou Samsung Electronics Co., Ltd  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
204 sets room air conditioners  
\$46,465.80 CIF

28602-6 –N SNLL41310053  
Shanghai/ Long Beach, CA  
Shipper: Suzhou Samsung Electronics Co., Ltd  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
816 sets of room air conditioners  
\$136,470.72 CIF

28602-6 –O SNLL41310054  
Shanghai/ Long Beach, CA  
Shipper: Suzhou Samsung Electronics Co., Ltd  
Consignee: GEA Products  
20005 Business Parkway  
Walnut City, CA 91789  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
1,368 sets of room air conditioners  
\$118,670.40 CIF

28602-6 –P SNLBL4000055  
Busan/ Los Angeles  
Shipper: II Woo Fastener Co.  
Consignee: GE Supply Logistics  
6100 W. 73<sup>rd</sup> Street, Unit #1  
Bedford Park, IL 60638  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
21 cases of studs and nuts

\$34,088.34 CIF

28602-6 -Q 04SE020003  
Chiwan/ Los Angeles  
Shipper: Quanxin Lighting & Electrecal Corporation  
Consignee: International Development Corp.  
2890 Market Loop  
Southlake, TX 76092  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
2,017 ctns of solar light sets  
\$40,069.00 CIF

28602-6 -R 04SE020002  
Chiwan/ Los Angeles  
Shipper: Quanxin Lighting & Electrecal Corporation  
Consignee: International Development Corp.  
2890 Market Loop  
Southlake, TX 76092  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
421 Solar Light Sets  
\$23,715.00 CIF

28602-6 -S SNTUSNLL43010064  
Dalian/ Los Angeles  
Shipper/Consignee: Leading Star Trading Co.  
Assured: Red River Foods  
PO Box 35612  
9020 Stoney Point Parkway, Suite 380  
Richmond, VA 23235  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
640 ctns Chinese pinenut kernels  
\$163,200.00 CIF

28602-6 -T SNLL42558001  
Xigang/ Long Beach, CA  
Shipper: Beijing Jinxin Wood En Industry  
Consignee: Good Companies  
1118 E 23<sup>rd</sup> Street  
Carson, CA 90745  
Insurance Co.: Ace USA

140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
347 boxes of furniture  
\$16,298.00 CIF

28602-6 –U SNLL42555003  
Xingang/ Long Beach  
Shipper: Beijing Linyuan Time Furniture  
Consignee: International Development Corp.  
2890 Market Loop  
Southlake, TX 76092  
Insurance Co.: Ace USA  
140 Broadway, 40<sup>th</sup> Floor  
New York, NY 10005  
50 ctns furniture  
\$8,640.00 CIF

28602-7 –A SNTUSNLL40490063  
Shanghai/ Long Beach, CA  
ABC Corp. and/or John Doe (names being fictitious)  
Identities of the Shipper, Consignee, and/or Insurance  
company(ies) to be supplemented once their precise identity(ies)  
are discovered.  
Insurer: XL Insurance Global Risk  
1 World Financial Center  
200 Liberty Park, 27<sup>th</sup> Floor  
New York NY 10281  
174 pkgs of baby garments  
\$10,092.00 CIF

28602-7 –B SNTUSNLL40490057  
Shanghai/ Long Beach, CA  
ABC Corp. and/or John Doe (names being fictitious)  
Identities of the Shipper, Consignee, and/or Insurance  
company(ies) to be supplemented once their precise identity(ies)  
are discovered.  
Insurer: XL Insurance Global Risk  
1 World Financial Center  
200 Liberty Park, 27<sup>th</sup> Floor  
New York NY 10281  
2,024 pkgs baby garments  
\$57,896.00 CIF

TOTAL CLAIMS: \$5,274,652.68



LIST OF DEFENDANTS

The M/V "TRADE ZALE"  
c/o Transeste Schiffahrt KG  
Mattentwiete 5  
Hamburg, Germany 20457

M/V "DIAMOND RAY"  
c/o Stamco Ship Management Co., Ltd.  
21 Akti Miaouli  
Piraeus, Greece 18535

ms Jan Ritscher Schiffahrtsges mbH & Co. Kg.  
c/o Transeste Schiffahrt KG  
Mattentwiete 5  
Hamburg, Germany 20457

Honshu Shipping Co. Ltd.  
c/o Stamco Ship Management Co., Ltd.  
21 Akti Miaouli  
Piraeus, Greece 18535

Hanjin Shipping  
80 East Route 4  
Suite 390  
Paramus, New Jersey 07652

Metro Consolidators Hong Kong  
Hong Kong, China

Aero Costa International  
460 East Carson Plaza Drive  
Carson, California 90746

RAF International Forwarding Inc.  
c/o Admiral Overseas Shipping  
444 West Ocean Boulevard  
Long Beach, California 90802

Carpe Air & Sea Shipping Inc.  
360 Sylvan Avenue  
Englewood Cliffs, New Jersey 07632

Air-Sea Transport Inc.  
731 South Garfield Avenue

Alhambra, California

CN Link Freight Services Inc.  
400 South Atlantic Boulevard  
Monterey Park, California 91754

Dynalink Systems Inc.  
31222 Las Cienega Boulevard  
Ingelwood, California 90304

Sino-Am Marine Company Inc.  
601 East Linden Avenue  
Linden, New Jersey 07036

Kasy Logistics Co., Ltd.  
c/o GMW freight Services  
Shell Road  
Richmond, British Colombia  
Canada

Intermodal Systems Ltd.  
118 Connaught Road West  
Hong Kong

Wice Marine Services Ltd.  
701 West Manchester Boulevard  
Inglewood, California 90301

CL Consolidators Services Ltd.  
16 Carnarvon Road  
Kowloon, Hong Kong

Younger Service Co., Ltd.  
Chang Road  
Taipei, Taiwan

A T Container Lines Ltd.  
c/o Dynasty Freight Consolidators Inc.  
100 North Hill Drive  
Brisbane, California

Sinotrans Container Lines  
301 West Warner Road  
Tempe, Arizona 85284

City Network Shipping Ltd

Hong Kong

Solex Express Inc.  
154-09 146<sup>th</sup> Avenue  
Jamaica, New York 11434

OEC Freight (Korea) Co. Ltd.  
Kuin Shin Building #172  
Dohwa-Dong, Mapo-ku  
Seoul, Korea

TVL Container Line Ltd.  
Hong Kong, China

Honour Lane Shipping  
12F Nan Fung Tower  
173 Des Voeux Road Central  
Hong Kong, China

Power Link Logistics Inc.  
Shanghai, China